



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OCT 16 1996

OFFICE OF  
SOLID WASTE AND EMERGENCY  
RESPONSE

**MEMORANDUM**

SUBJECT: National Remedy Review Board Recommendations on the New Brighton  
Superfund Site

FROM: Bruce K. Means, Chair  
National Remedy Review Board

A handwritten signature in dark ink, appearing to read "B. Means", is placed to the right of the "FROM:" line.

TO: William E. Muno, Director  
Waste Management Division  
EPA Region 5

Purpose

The National Remedy Review Board (NRRB) has completed its review of the proposed remedial action for the New Brighton Superfund site in Arden Hills, Minnesota. This memorandum documents the NRRB's advisory recommendations.

Context for NRRB Review

As you recall, the Administrator announced the NRRB as one of the October 1995 Superfund Administrative Reforms to help control remedy costs and promote consistent and cost-effective decisions. The NRRB furthers these goals by providing a cross-regional, management-level, "real time" review of high cost (and thus potentially controversial) proposed response actions. The Board will review all proposed cleanup actions where: (1) the estimated cost of the preferred alternative exceeds \$30 million, or (2) the preferred alternative costs more than \$10 million and is 50% more expensive than the least costly, protective, ARAB-compliant alternative. The NRRB review evaluates the proposed actions for consistency with the National Contingency Plan and relevant Superfund policy and guidance. It focuses on the nature and complexity of the site; health and environmental risks; the range of alternatives that address site risks; the quality and reasonableness of the cost estimates for alternatives; Regional,

-- Pre-decisional; Not for distribution --

State/tribal, and other stakeholder opinions on the proposed actions (to the extent they are known at the time of review); and any other relevant factors.

Generally, the NRRB makes “advisory recommendations” to the appropriate Regional decision maker before the Region issues the proposed plan. The Region will then include these recommendations in the Administrative Record for the site. While the Region is expected to give the Board’s recommendations substantial weight, other important factors, such as subsequent public comment or technical analyses of remedial options, may influence the final Regional decision. It is important to remember that the NRRB does not change the Agency’s current delegations or alter in any way the public’s role in site decisions.

#### NRRB Advisory Recommendations

The NRRB reviewed the site package for the New Brighton site and discussed related issues with the State of Minnesota Project Manager Dagmar Romano and EPA Remedial Project Manager Tom Barounis on August 15th, 1996. Based on this review and discussion, the NRRB makes the following recommendations:

- The NRRB finds that the basis for the preferred soil remediation goals are unclear. The Board believes that some of these goals are low (e.g., dioxin/furans, arsenic), particularly given the proposed industrial exposure scenario. Further, the Army should consider using one or more of the recently developed adult lead exposure models (e.g., the “Bowers model” currently under consideration by the Superfund Lead Technical Review Workgroup) to assist in evaluating baseline risk, and to help establish a site-specific lead cleanup level. Although not yet adopted in formal Agency policy, use of such a model can help fine-tune, or provide additional scientific and technical support for the Region’s proposed soil lead cleanup level. The discussion of cleanup goals should clearly identify which contaminants are determining the scope and cost of excavation. The goals should also take into account reasonably anticipated future land use (see the last discussion point below).
- The NRRB supports the excavation and offsite disposal of the small volumes of contaminated soil that the Army has proposed. The NRRB recommends that the Army evaluate the cost effectiveness of onsite vs. offsite stabilization (if needed) of excavated soils. The NRRB also supports the expanded use of soil vapor extraction to address the contaminated subsurface soils. However, the Army should consider further characterization of the soils beneath buildings in areas I and K to determine the practicability and benefits of active remediation vs. the present containment approach.
- The NRRB could not ascertain whether the Army’s objective for groundwater is to contain (or attenuate) contamination, or to restore the groundwater. If restoration is a final groundwater treatment objective, the Army should evaluate more aggressive treatment options. Until the practicability of restoration is determined, the NRRB recommends that the deep ground water portion of this remedy be considered an interim response.
- If the Army’s groundwater remediation strategy includes the use of a technical impracticability waiver, adequate data should be gathered to determine the practicability of restoration. For example, if a technical impracticability waiver is to be based on the presence of DNAPLs, the Army should further evaluate the extent of this problem. The NRRB also notes that, given the extent of groundwater contamination and the several municipalities and jurisdictions affected, successful institutional controls are particularly

important to ensure protectiveness of the groundwater response strategy.

- EPA's May 25, 1995, Directive on Land Use in the CERCLA Remedy Selection Process (OSWER Directive No. 9355.7-04) states that appropriate discussions with the public should be conducted as early as possible in the scoping phase of the Remedial Investigation/Feasibility Study. From the materials available to the NRRB, it does not appear that the Army sought community input in determining the proposed reasonably anticipated future land use (industrial). Further, it is not clear how the Re-use Committee and Re-use Plan developed for the site affected the Army's proposed land use determination.

The NRRB appreciates the Region's efforts to work closely with Army, the State, and the community to identify the current proposed remedy. The Board members also express their appreciation to both the Region and the State of Minnesota for their participation in the review process. We encourage Region 5 management and staff to work with their Regional NRRB representative and the Region 5/7 Accelerated Response Center at Headquarters to discuss appropriate follow-up actions.

Please do not hesitate to give me a call if you have any questions at 703-603-8815.

cc: V. Adamkus  
S. Luftig  
E. Laws  
T. Fields  
P. Nadeau  
J. Woolford